

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

DOMINIQUE WALDEN,

Plaintiff,

v.

Civil No. 3:24-cv-00317-DJN

EQUIFAX INFORMATION SERVICES,  
LLC, EXPERIAN INFORMATION  
SOLUTIONS, INC., TRANS UNION,  
LLC, LVNV FUNDING, LLC, and  
NAVY FEDERAL CREDIT UNION,

Defendants.

**DEFENDANT TRANS UNION LLC'S CONSENT MOTION FOR EXTENSION OF  
TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Trans Union LLC ("Trans Union"), by and through its counsel of record, and pursuant to FED. R. CIV. P. 6(b)(1), hereby files its Consent Motion for Extension of Time to File its Answer or Otherwise Respond to Plaintiff's Complaint ("Complaint"), and respectfully shows the Court the following:

1. Plaintiff, Dominique Walden, filed the Complaint in this action on May 6, 2024. Dkt. No. 1. Trans Union was served with the Complaint on May 15, 2024. Dkt. No. 4.
2. The current deadline for Trans Union to answer or otherwise respond to the Complaint is June 5, 2024. Trans Union respectfully requests a 21-day extension of that deadline up to, and including, June 26, 2024.
3. Counsel for Trans Union communicated with Plaintiff's counsel regarding the requested extension of the deadline to file a response to the Complaint, and Plaintiff's counsel agreed to a 21-day extension.
4. Good cause exists for Trans Union's request for an extension to file its answer or otherwise respond to the Complaint. Trans Union needs additional time to locate and assemble the

documents and information relating to Plaintiff's credit file and any dispute(s) submitted by Plaintiff. In addition, Trans Union's counsel needs additional time to review Trans Union's documents and information and to respond to the allegations in the Complaint.

5. In addition, the added time afforded by the extension will also enable Plaintiff and Trans Union to fully explore an early settlement, potentially obviating the need for further use of court time and resources.

6. No party will be prejudiced by the extension. The case was recently filed, and no substantive activities have taken place.

7. The time to respond to the Complaint has not expired. No prior extension of this deadline has been requested.

8. Trans Union does not request oral argument on this Motion.

9. A proposed Order granting this Consent Motion is attached hereto.

WHEREFORE, Defendant Trans Union, by counsel, hereby respectfully requests the Court enter an Order: (1) granting its Consent Motion for Extension of Time; (2) provide Trans Union with an extension of time to file its responsive pleadings to the Complaint until on or before June 26, 2024; and (3) awarding Trans Union such other and further relief as the Court deems appropriate.

Respectfully submitted,

/s/ Marc F. Kirkland

Marc F. Kirkland  
Virginia Bar Number 96234  
*Attorneys for Trans Union LLC*  
Quilling, Selander, Lownds,  
Winslett & Moser, P.C.  
6900 N. Dallas Parkway, Suite 800  
Plano, Texas 75024  
Phone: (214) 560-5454  
Fax: (214) 871-2111  
mkirkland@qslwm.com

DATED: June 3, 2024.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of June 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record registered to use the CM/ECF system in this action, as follows:

Jason M. Krumbein  
[JKrumbein@krumbeinlaw.com](mailto:JKrumbein@krumbeinlaw.com)  
Krumbein Consumer Legal Services, Inc.  
1650 Willow Lawn Drive, Suite 201  
Richmond, VA 23230  
***Counsel for Plaintiff***

/s/ Marc F. Kirkland

Marc F. Kirkland  
Virginia Bar Number 96234  
*Attorneys for Trans Union LLC*  
Quilling, Selander, Lownds,  
Winslett & Moser, P.C.  
6900 N. Dallas Parkway, Suite 800  
Plano, Texas 75024  
Phone: (214) 560-5454  
Fax: (214) 871-2111  
mkirkland@qslwm.com